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November 14, 1990

Mr. Richard Breitenstein
Water Quality Specialist
Pennsylvania Department of Environmental Resources
1875 Hope Street
Norristown, Pennsylvania 19401

RE: LUST/Groundwater
Scott Paper - Chester Facility
October 1990 Bimonthly Report

Dear Mr. Breitenstein:

The following contains a review of the work conducted to date at Scott Paper Company, Chester Operations concerning the release of No. 2 fuel oil into the groundwater, as requested in your letter dated September 26, 1990.

INTRODUCTION

In January 1989, No. 2 fuel oil was discovered leaking from a broken pipeline. This pipe was formerly used to supply fuel oil to the barge unloading station. The oil migrated from the pipe leak through a storm sewer trench and discharged into a cove adjoining the Delaware River. Upon discovery of the fuel oil release, Scott Paper Company took steps to stop the leak by immediately removing the fuel oil from Tank No. 4 and closing the tank valves. The volume of oil which leaked from the pipe was unknown. The oil which had been discharged was contained by Clean Harbors, Inc. before it reached the main channel of the river. Clean Harbors, Inc. used containment and absorbent booms to capture the floating oil. This method of oil recovery was approved and periodically monitored by the United States Coast Guard.

Small quantities of oil were subsequently observed in the cove during low tide and after heavy precipitation. Clean Harbors, Inc. maintained clean-up activities on a daily basis and by the fall of 1989 discharge to the river had discontinued.

In January 1990, after a period of heavy precipitation, the discharge near the cove recommenced. Guardian Environmental Services of Bear, Delaware were immediately contacted to maintain clean-up activities on a daily basis. It was believed that the oil present in the subsurface was a result of the release that occurred during the previous leak in January 1989. However, during excavation activities near the fuel oil tank No. 4, Scott personnel discovered a leak in a 3/8-inch pipe connecting the No. 2 fuel oil pump house to the oil fill line

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from the barge unloading station. Although the pipe had not been used in some time, it had not been valved off allowing the leak to occur.

GROUNDWATER REMEDIATION

In the fall of 1989 Triegel & Associates, Inc. were contracted to conduct several investigations of the site to determine the nature, source, and extent of subsurface oil contamination. These investigations included:

1. Exploratory soil boring investigation and installation of a groundwater monitor well (report dated November 9, 1989); and
2. Exploratory trench investigation (report dated January 22, 1990).

Exploratory soil borings were conducted on October 3, 1989 consisting of six test borings, each with depths ranging from 10 to 16 feet. Samples were collected from the borings for testing. As a result of the testing, Triegel & Associates recommended the installation of recovery well to recover the free product in the subsurface.

The installation of the oil recovery system is nearing completion and should be ready for start up in November 1990. Groundwater will be recovered with two large diameter (24-inch) recovery wells. The wells are completed to a depth of 10 to 12 feet, approximately 4 to 6 feet below static groundwater level.

Scott has solicited proposals for in-situ bioremediation from a number of consultants (Groundwater Technology, Inc. and Triegel & Associates). Drafts of the proposals were received by key Scott personnel on October 19, 1990. The proposals will be reviewed by Scott personnel by November 16, 1990 and returned to the consultants with comments. The consultants will then be asked to submit a comprehensive proposal to Scott by December 1, 1990. The comprehensive proposals will be reviewed by Scott Engineering which will select a consultant and submit a detailed work plan to the Department by February 1, 1991.

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If you have any comments or questions concerning the information presented in this letter, please call me at 215-499-6043.

Sincerely,



DeNorris Williams
Process Engineer

cc: Mr. R. K. Anderson
Mr. D. R. Haldeman
Mr. A. Kuchibhotla
Mr. J. R. Platko - Staff

jmh